

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Carsten Quinlan, et al.,

Case No. 24-cv-2782 (PAM/ECW)

Plaintiffs,

v.

Washington County, City of Woodbury,  
Kim Richardson, Hailey Dornfeld,  
Keshini Ratnayake, Tom Wedes,  
Mathew Stephenson, Chris Murphy,  
and Unknown John/Jane Doe(s),

Defendants.

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**DEFENDANTS  
CITY OF WOODBURY AND  
KIM RICHARDSON'S  
MOTIONS FOR MORE  
DEFINITE STATEMENT AND/OR  
TO STRIKE PLAINTIFF'S  
AMENDED COMPLAINT**

City Defendants respectfully move this Court for an Order as follows:

1. Granting City Defendants' Motion for More Definite Statement under Fed. R. Civ. P. 12(e) and requiring Plaintiff comply with Rule 8's pleading requirements, including that the Complaint must "contain a short and plain statement of the claim;"
2. Granting City Defendants' Motion to Strike under Fed. R. Civ. P. 12(f) and striking confidential information from Plaintiff's Complaint (including exhibits) and Amended Complaint, including but not limited to, striking the following:
  - a. Plaintiff's minor children's full names from the caption, pleading(s), and all exhibits;
  - b. Plaintiff's minor children's medical history, including medical procedures performed and medications prescribed/administered (see, e.g., Exhibit J);

- c. Custody Evaluation, Exhibit F, as it was previously deemed confidential by both this Court and a Dane County, WI court;
- d. Jurors' identifies, medical information, arrest history, and family history of abuse from the Amended Complaint; and
- e. Factual allegations that are irrelevant and harassing.

3. Directing Plaintiff to file a Second Amended Complaint that complies with Fed. R. Civ. P. 8 and 10 within 14 days of the Court's Order and, if Plaintiff fails to file a Second Amended Complaint in compliance with the Federal Rules of Civil Procedure and this Court's Order, dismissing Plaintiff's Complaint with prejudice.

4. For other relief the Court deems just and equitable.

This motion is made pursuant to Rule 12 of the Federal Rules of Civil Procedure and is based upon all the files, records, and proceedings herein and on the memorandum of law that will be submitted in support of this motion. City Defendants will serve and file their memorandum in support of this motion in accordance with LR 7.1.

**JARDINE, LOGAN & O'BRIEN P.L.L.P.**

Dated: July 19, 2024

By: s/ Vicki A. Hruby

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and Kim Richardson*